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BEFORE THE
Federal Communications Commission
WASHINGTON, D.C. 20554

[REDACTED]

In the Matter of)

Revision of the Commission's Rules)
to Ensure Compatibility with)
Enhanced 911 Emergency Calling)
Systems)

CC Docket No. 94-102
RM-8143

RECEIVED

MAR 17 1995

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

To: The Commission

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REPLY COMMENTS OF STARSYS GLOBAL POSITIONING, INC.

STARSYS Global Positioning, Inc. ("STARSYS"), by its attorneys and pursuant to Sections 1.415 and 1.419 of the Commission's Rules, replies to initial comments concerning the above-captioned Notice of Proposed Rule Making, Revision of the Commission's Rules to Ensure Compatibility With Enhanced 911 Emergency Calling Systems, 9 FCC Rcd 6170 91994) ("NPRM"). In its initial comments, STARSYS urged the Commission not to extend enhanced 9-1-1 ("E-911") requirements to the non-voice, non-geostationary mobile satellite service ("NVNG MSS").

Most other commenters addressing this issue agreed with STARSYS for reasons including, inter alia, the limited message capacity of non-voice systems, the inability of emergency personnel to interact with "callers" in real time, and the high costs associated with adapting NVNG MSS systems to achieve some level of compatibility with E-911.^{1/} For example, Orbcomm notes that current NVNG MSS

^{1/} See Comments of Orbital Communications Corporation ("Orbcomm"); Comments of Leo One USA Corporation.

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system technology could not be used to meet the Commission's proposed E-911 standards, requiring addition of Global Positioning Satellite computer chips in order to achieve compatibility.^{2/} This change, in turn, would drive up the cost of transceiver units and increase their size and weight, making the service more expensive and less convenient,^{3/} and very likely raising prices beyond the reach of many consumers that would otherwise use the service.^{4/} This would, in fact, deprive these potential users of the positioning and distress signaling capabilities that NVNG MSS can offer without costly modification.

Indeed, even entities that otherwise supported broad applicability of E-911 requirements to wireless services concurred that non-voice services in general should be excluded. For example, the Texas Advisory Commission on State Emergency Communications ("TX-ACSEC") suggested that while "[t]he Commission should not restrict providers of non-voice services from providing 9-1-1 access . . . provision of 9-1-1 access should be left to free market pressures and local restrictions."^{5/}

Only the Interagency Committee on Search and Rescue ("ICSAR") and the U.S. Coast Guard express contrary views. Neither, however, provides any

^{2/} See Orbcomm Comments at 4.

^{3/} See id. at 4-5.

^{4/} See id. at 6.

^{5/} See TX-ACSEC Comments at 8.

substantive discussion of how 911 services might work in a non-voice environment. Instead, both simply lump the NVNG MSS in with other wireless communications services, and suggest that E-911 should apply to all of them.^{6/} The only elaboration on this view comes from ICSAR, which simply states its belief that "non-voice MSS systems will be used for distress alerting, even though they are currently incompatible with 911 systems and may involve some time delay."^{7/} Thus, rather than providing a justification for requiring NVNG MSS systems to adopt some form of E-911, ICSAR has cited some of the same sound reasons provided by STARSYS and others for reaching the opposite result.

Accordingly, based on the comments filed in this proceeding, there is no record support for a Commission mandate that NVNG MSS systems provide E-911 services. Although NVNG MSS systems can be expected to play a significant role in assisting emergency responses, no purpose would be served in trying to integrate the services involved with the E-911 service. For this reason, the Commission should,

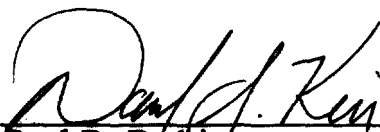
^{6/} See ICSAR Comments at 4; U.S. Coast Guard Comments at 10.

^{7/} ICSAR Comments at 4.

consistent with its initial proposal, exclude the NVNG MSS from any E-911 requirements that may ultimately be adopted in this proceeding.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I, Kaigh K. Johnson, do hereby certify that true and correct copies of the foregoing "Reply Comments of STARSYS Global Positioning, Inc." were mailed, first-class postage prepaid, this 17th day of March, 1995 to the following:


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